

**A RESOLUTION ADOPTING THE 2016 TITLE VI PROGRAM,  
INCLUDING TITLE VI NONDISCRIMINATION, LIMITED ENGLISH  
PROFICIENCY AND PUBLIC INVOLVEMENT PLANS FOR JEFFTRAN**

**WHEREAS,** JEFFTRAN and the City of Jefferson, Missouri, are committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI of the Civil Rights Act of 1964; and

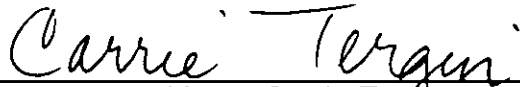
**WHEREAS,** JEFFTRAN and the City of Jefferson, Missouri, Council further desire to ensure accessibility to programs and services to otherwise eligible persons who are not proficient in the English language; and

**WHEREAS,** JEFFTRAN and the City of Jefferson, Missouri, desire to encourage public involvement by citizens and stakeholders in decisions that affect transit and transit patrons, including prior to enacting fare increases and major transit service reductions.

**NOW THEREFORE, BE IT RESOLVED** by the City Council of the City of Jefferson, Missouri, that the City hereby acknowledges and adopts the **2016 Title VI Program, including Title VI, Limited English Proficiency and Public Involvement Plans** attached hereto as "Attachment A;" and

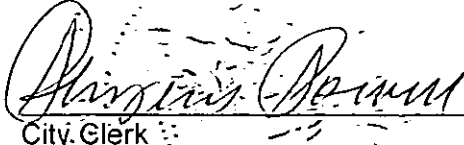
**BE IT FURTHER RESOLVED** that this approval shall be continuing in nature, until new plans, policies and programs are approved by the Council, and shall not expire with the adjournment of this Council.

ADOPTED this 16<sup>th</sup> day of May, 2016

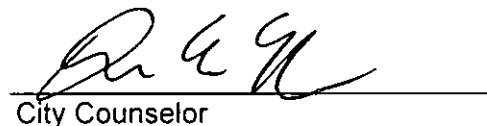


Mayor Carrie Tergin

ATTEST:

  
City Clerk

APPROVED AS TO FORM:

  
City Counselor

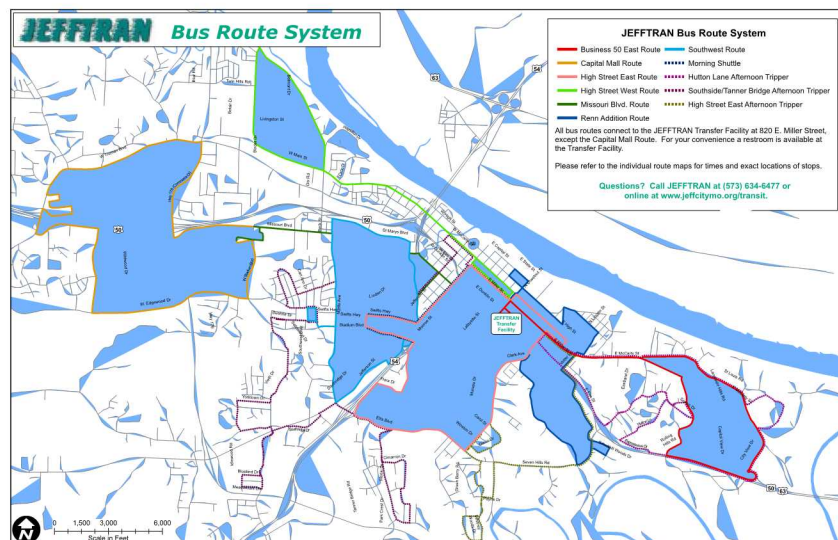
# ***JEFFTRAN***

***TRANSIT PROVIDER FOR JEFFERSON CITY, MISSOURI***



## **2016 TITLE VI PROGRAM**

***Title VI, Limited English Proficiency and Public Involvement Plans***



The preparation of this report was financed in part by the U.S. Department of Transportation, Federal Highway Administration, and Federal Transit Administration, in cooperation with the Missouri Department of Transportation. The opinions, findings, and conclusions expressed in this report are not necessarily those of the Federal Highway Administration, Federal Transit Administration, or the Missouri Department of Highways and Transportation

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Steven S. Crowell Jr., City Administrator  
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***JEFFTRAN is a Division within the Department of Public Works***

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ADOPTED this 16<sup>th</sup> day of May, 2016

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Mayor Carrie Tergin

ATTEST:

APPROVED AS TO FORM:

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City Clerk

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City Counselor

## SECTION ONE. TITLE VI / NONDISCRIMINATION PLAN

### **I. Background**

The Federal Transit Administration requires recipients to report certain general information to determine compliance with Title VI. The collection and reporting of this information constitutes a recipient's Title VI Program. To ensure compliance with 49 CFR Section 21.9 (b), the FTA requires that all recipients document their compliance with this chapter by submitting a Title VI Program to the FTA's regional civil rights officer once every three years. This report is provided as set forth in Title VI of the Civil Rights Act of 1964; Title 49, Chapter 53, Section 5332 of the United States Code; and the Federal Transit Administration's (FTA) Circular 4702.1B, titled "VI Requirements and Guidelines for Federal Transit Administration Recipients", dated October 1, 2012.

### **II. Organization**

*JEFFTRAN* (also known as the Transit Division) is a direct operator of fixed route and demand response public transportation service in Jefferson City, Missouri, and is a direct recipient of Federal Transit Administration funds and does not have any sub-recipients. *JEFFTRAN* currently has twelve fixed route buses and ten paratransit buses. Nine buses operate in peak service on the fixed routes and eight do so for paratransit bus service. *JEFFTRAN* is organized as a division in the Department of Public Works within the City of Jefferson, a municipal corporation. *JEFFTRAN*'s Director reports to the Director of Public Works. The Director of Public Works reports to the City Administrator, who in turn, reports to the Mayor and City Council of the City of Jefferson, Missouri. The City Counselor has been designated as the Title VI Coordinator for the City of Jefferson. The City Counselor reports directly to the City Council of the City of Jefferson, Missouri.

### **III. General Program Responsibilities**

1. **Data Collection.** Statistical data on race, color, national origin, income level, language spoken and sex of participants in, and beneficiaries of federally funded programs will be gathered for use in planning and program analysis. Upon request by the Title VI Coordinator, the City's transportation planning division will prepare reports from data available from the Census Bureau and other readily available sources. The transportation planning division will assist the transit division with preparation of surveys and other data collection tools needed to prepare plans and reports.
2. **Annual Report and Update.** An Annual Report and Update is to be submitted to the MoDOT Office of Civil Rights and the FTA in April of each year. The Title VI Coordinator is responsible for gathering information from appropriate staff members and consolidating this information into the final document. The final document is to include:
  - A report on the previous year's Title VI-related activities and efforts, including accomplishments and program changes;
  - An update on Title VI-related goals and objectives for the upcoming year.

3. **Annual Review of the Title VI Program.** Each year, in preparing for the Annual Report and update, the Title VI Coordinator will review *JEFFTRAN's* Title VI program to assure compliance with Title VI. In addition, he or she will review agency operational guidelines and publications, including those for contractors, to ensure that the Title VI language and provisions are incorporated, as appropriate.
4. **Dissemination of Information Related to the Title VI Program.** Information on *JEFFTRAN's* Title VI program is to be disseminated to *JEFFTRAN* employees, contractors, and beneficiaries, as well as to the public, and in other languages when needed.
5. **Resolution of Complaints.** Any individual may exercise his or her right to file a complaint with *JEFFTRAN/City of Jefferson, Missouri*, if that person believes that he or she or any other program beneficiaries have been subjected to unequal treatment or discrimination, in their receipt of benefits/services or on the grounds of race, color, or national origin. *JEFFTRAN* will make a concerted effort to resolve complaints as put forth in the Title VI Complaint procedure, as shown in Appendix B.

#### **IV. Responsibilities of the Title VI Coordinator**

The Title VI Program Coordinator is responsible for coordinating staff activities pertaining to Title VI regulations and procedures set forth in federal guidance and in accordance with the City's Title VI Procedures Manual. In support of this the Title VI Coordinator will:

Identify, investigate and work to eliminate discrimination when found to exist.

Process Title VI complaints received.

Meet with appropriate staff members to monitor and discuss progress, implementation, and compliance issues related to the Title VI program.

Periodically review the Title VI program to assess if administrative procedures are effective, staffing is appropriate, and adequate resources are available to ensure compliance.

If a federal funding recipient is found to not be in compliance with Title VI, work with affected staff and the recipient to resolve the deficiency status and write a remedial action if necessary.

Review important Title VI-related issues with the City Administrator, Mayor and City Council, as needed.

Assess communications and public involvement strategies to ensure adequate participation of impacted Title VI protected groups and address additional language needs when needed.

#### **V. Responsibilities of Other Staff Members**

At times other staff members will be asked to accept or share responsibility for day-to-day administration of the Title VI program, including implementation of the plan and Title VI compliance, program monitoring, reporting and education within an applicable program area, as described in the "Program Area Responsibilities" section of this document. In addition, some staff members may be asked to accept responsibility for drafting text for an assigned section of the Annual Title VI Report and update, and maintaining the data and documentation necessary for that report. These responsibilities may include reviewing guidelines and procedures for the assigned Title VI Program Area, and incorporating Title VI-related language and provisions into agency documents, as appropriate.

Staff responsible for *JEFFTRAN's* public involvement is responsible for compliance with Title VI requirements in all aspects of *JEFFTRAN's* public involvement process. These staff members will:

Ensure that all communications and public involvement efforts comply with Title VI;

Develop and distribute information on Title VI and *JEFFTRAN* programs to the general public;

Provide information in languages other than English, as needed.

Disseminate information to media, post on social media, and disseminate information to minority/ethnic/gender related organizations in order to ensure social, economic, and ethnic interest groups are represented in the planning process.

## **VI. Title VI Notice**

*JEFFTRAN* publishes a Title VI notice, in English and Spanish, as shown in Appendix A.

The Title VI Notice is posted at the following locations:

- On the JEFFTRAN Webpage at [www.jefftran.org](http://www.jefftran.org)
- All Transit Vehicles
- City of Jefferson, Missouri: City Hall Bulletin Board, Main Level  
John G. Christy Municipal Building-City Hall  
320 McCarty Street  
Jefferson City, Missouri 65101
- *JEFFTRAN* Administrative Office: Customer Service Window  
Charles G. Robinson Transit Facility  
820 E. Miller Street  
Jefferson City, Missouri 65101

## **VII. Title VI Discrimination Claim Procedures**

Instructions to the public regarding filing a Title VI discrimination claim are included in this plan as *Appendix B*. Hard copies of the publication “Title VI Complaint Procedures and Complaint Form” are available at the following locations:

City of Jefferson, Missouri: In the “forms” array on the lower level of City Hall  
320 E. McCarty Street  
Jefferson City, Missouri 65101

*JEFFTRAN* Administrative Office: Customer Service Window  
Charles G. Robinson Transit Facility  
820 E. Miller Street  
Jefferson City, MO 65101

Electronically via the Transit webpage and the following link:

[http://www.jeffersoncitymo.gov/government/transit/title\\_vi.php](http://www.jeffersoncitymo.gov/government/transit/title_vi.php)

## **VIII. Title VI Investigations, Complaints or Lawsuits**

The following table presents the public transportation-related Title VI investigations, complaints, or lawsuits filed since the time of the last submission.

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
<b>Investigations</b>				
-- None Known				
<b>Lawsuits</b>				
-- None Known				
<b>Complaints</b>				
--None Known				

## IX. Public Outreach and Involvement, 2013-2015

The following public outreach and involvement activities have been undertaken since the last submission.

### Proposed Service Change Outreach

- Open House-style meetings for a proposed fare increase was held on May 22, 2015 and May 28, 2015.
- Notices were posted in English and Spanish at the locations cited in Section 3, notices to the public.

Transit Focus Group meetings were initiated in 2007. The following table shows the Transit Focus Group meetings conducted 2012-2015.

<i><b>2013</b></i>	<i><b>2014</b></i>	<i><b>2015</b></i>
	January 28	January 27
	April 22	April 28
July 30	July 29	July 28
Nov 5	October 28	October 27

A new entity, the Public Transit Advisory Committee, was formed by the City Council via Ordinance 1507 passed September 15, 2014. Meeting functions have transitioned from the Transit Focus Group to the Public Transit Advisory Committee (TAC). At this time, the TAC expects to meet six times over the course of each year.

<b>2014-2018 Public Transit Advisory Committee Meeting Dates</b>			
<i><b>2015</b></i>	<i><b>2016</b></i>	<i><b>2017</b></i>	<i><b>2018</b></i>
January 26	January 26	January 31*	January 30*
April 27	March 29	March 28*	March 27*
July 27	May 24*	May 30*	May 29*
October 26	July 26*	July 25*	July 31*
	September 27*	September 26*	September 25*
	November 29*	November 28*	November 27*
* Planned Meeting Dates			



## **X. Fixed Facility Analysis**

The Requirement: If the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc., the recipient shall include a copy of the Title VI equity analysis conducted during the planning stage with regard to the location of the facility.

- *JEFFTRAN Response: No construction projects qualifying under this section were undertaken in the last three years, and none are included in the FY 2016 TIP. No Fixed Facility Analysis is included in this submittal.*

## **XI. Minority Representation on Transit-Related Committees and Advisory Councils**

The Requirement: Recipients that have transit-related, non-elected planning boards, advisory councils or Committees, or similar bodies, the membership of which is selected by the recipient, must provide a table depicting the membership of those committees broken down by race, and a description of efforts made to encourage the participation of minorities on such committees.

- *JEFFTRAN Response: A new entity, the Public Transit Advisory Committee, was formed by the City Council via Ordinance 1507 passed September 15, 2014.*

<b><i>Public Transit Advisory Committee</i></b>	
<b><i>Name</i></b>	<b><i>Race</i></b>
Ann Bax	White
Bill Case	White
Terry Donner	African-American
Larry Henry	African-American
Wayne Lee	White
William Marshall	White
Royal Spiedel	White
Frank Underwood	White

- *The City Council reminds the public at most council meetings regarding opportunities to serve on City Boards and Commissions. These meetings are streamed live and available on the city's YouTube channel. The Boards and Commissions application (including the Public Transit Advisory Committee) is available on the City's website at [http://www.jeffersoncitymo.gov/Boards\\_Commissions/VolunteerProfileForm.pdf](http://www.jeffersoncitymo.gov/Boards_Commissions/VolunteerProfileForm.pdf).*
- *JEFFTRAN began its foray into social media with a presence on Facebook because it is the most-used social media platform used by minorities, according to the Pew Research Center. <http://www.pewresearch.org/fact-tank/2015/02/03/social-media-preferences-vary-by-race-and-ethnicity/>.*
- *Both JEFFTRAN and the City of Jefferson solicit Public Transit Advisory Committee participation via posts on Facebook pages as well as via the web. Regarding the Public Transit Advisory Committee, JEFFTRAN specifically states in Facebook posts that minority candidates are encouraged to apply.*

- *The City of Jefferson (which hosts JEFFTRAN's web presence) updated its website in 2015. One of the features of the new website is the ability to use Google Translate to dynamically translate the site into over 100 languages, which may widen the pool of potential minority applicants.*

## **XII. Service Standards**

### **(1) Vehicle Load Standards**

The average of all loads during the peak operating period should not exceed vehicles' achievable capacities, which are 30 passengers for a 25-foot mini-bus, 48 passengers for low-floor 35-foot buses and 55 passengers for low-floor 35-foot buses.

### **(2) Vehicle Headway Standards**

Service operates on regular route schedule on weekdays with 40 minute or better service intervals which should begin no later than 6:40 a.m. and continue until 6:00 p.m. Scheduling involves the consideration of a number of factors including: ridership productivity, transit/pedestrian friendly streets, density of transit-dependent population and activities, land use connectivity, and transportation demand management.

### **(3) On-Time Performance Standards**

Ninety-seven (97) percent of the *JEFFTRAN's* transit vehicles will complete their established runs no more than 5 minutes early or late in comparison to the established schedule/published timetables.

### **(4) Service Availability Standards**

*JEFFTRAN* distributes transit service so that 81.5% of all residents in the service area are within a ¼ mile of the bus route.

## **XIII. Service Policies**

### **(1) Vehicle Assignment Policy**

All vehicles are low-floor, ramp equipped, with air conditioning and an Automatic Vehicle Location System (AVL) with an average age of 5.9 years. Bus assignments take into account the operating characteristics of buses of various lengths, which are matched to the operating characteristics of the route. Local routes with lower ridership may be assigned 30-foot buses rather than the 35-foot buses. Some routes requiring tight turns on narrow streets are operated with 30-foot rather than 35-foot buses. Transportation vehicles assigned to routes will not be determined on the basis of race, color or national origin.

### **(2) Transit Amenities Policy**

Installation of transit amenities along bus routes are based on the number of passenger boardings at stops along those routes.

## SECTION TWO: LIMITED ENGLISH PROFICIENCY PLAN

### I. Introduction

*Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency*<sup>1</sup> was signed on August 11, 2000 to clarify Title VI of the Civil Rights Act of 1964. It had, as its purpose, the goal to ensure accessibility to programs and services to otherwise eligible persons who are not proficient in the English language. This order affected not only Federal agencies, but also state and local agencies. Executive Order 13166 stated that individuals who do not speak English well and who have a limited ability to read, write, speak, or understand English are entitled to language assistance under Title VI of the Civil Rights Act of 1964 with respect to a particular type of service, benefit, or encounter.<sup>2</sup> These individuals are referred to as being limited English proficient, or “LEP.”

*Each Federal agency shall prepare a plan to improve access to its federally conducted programs and activities by eligible LEP persons. Each plan shall be consistent with the standards set forth in the LEP Guidance, and shall include the steps the agency will take to ensure that eligible LEP persons can meaningfully access the agency's programs and activities.* — Executive Order 13166.

Not only do all federal agencies have to develop LEP Plans as a condition of receiving federal financial assistance, but recipients of federal funds, such as the City of Jefferson, must comply with Title VI and LEP guidelines of the federal agency from which funds are provided. Federal financial assistance including grants, training, use of equipment, donations of surplus property, and other forms of financial contributions from federal sources. Recipients of federal funds range from state and local agencies, to nonprofits, and other organizations. Title VI covers a recipient's entire program or activity, which means all parts of a recipient's operations are covered. This is true even if only one part of the recipient receives the federal assistance. Simply put, any organization that receives federal financial assistance is required to follow Executive Order 13166. JEFFTRAN must comply with these guidelines because it receives funding from the US Department of Transportation (US DOT) via the Federal Transit Administration (FTA).

The US Department of Transportation published *Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons* in the Federal Register dated December 14, 2005.<sup>3</sup> The US DOT policy recommendations explicitly identify transit operators as organizations required to follow the guidance.

The guidance applies to all DOT funding recipients, which includes state departments of transportation, state motor vehicle administrations, airport operators, **metropolitan planning organizations, and regional, state, and local transit operators**, among many others. Coverage extends to a recipient's entire program or activity, i.e., to all parts of a recipient's operations. This is true even if only one part of the recipient receives the Federal assistance. For example, if DOT provides assistance to a state department of transportation to rehabilitate a particular highway on the National Highway System, all of the operations of the entire state department of transportation—not just the particular highway program or

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<sup>1</sup> The executive order verbatim and can be found online at <http://www.lep.gov/13166/eo13166.html>.

<sup>2</sup> Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons. Federal Register: December 14, 2005 ([Volume 70, Number 239](#)).

<sup>3</sup> The FTA's Office of Civil Rights offers guidance via an [LEP Handbook](#).



project—are covered by the DOT guidance. — US DOT Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons

To assist JEFFTRAN in meeting Title VI and Limited English Proficiency requirements of both the Federal Highway Administration and the Federal Transit Administration, JEFFTRAN conducted a program evaluation to determine what activities would be most appropriate to ensure compliance with Limited English Proficiency requirements.

## **II. Elements of an Effective LEP Policy<sup>4</sup>**

The US Department of Transportation Federal Transit Administration, Office of Civil has developed a set of planning elements that were incorporated into the design of this Limited English Proficiency Plan. These elements include:

1. Identifying LEP persons;
2. Identifying ways in which language assistance will be provided;
3. Training staff;
4. Providing notice to LEP persons;
5. Implementation of the Four-Factor analysis as identified by the US DOT.

## **III. Methodology for Assessing Needs and Reasonable Steps for an Effective LEP Policy**

The DOT guidance outlines **Four Factors** that recipients should apply to the various kinds of contact they have with the public in order to assess language needs and decide what reasonable steps they should take to ensure meaningful access for LEP persons. These factors are:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
2. The frequency with which LEP individuals come in contact with the program.
3. The nature and importance of the program, activity, or service provided by the recipient to the LEP Community.
4. The resources available to JEFFTRAN and overall cost.

The greater the number or proportion of eligible LEP persons; the greater the frequency with which they have contact with a program, activity, or service; and the greater the importance of that program, activity, or service, the more likely enhanced language services will be needed. The intent of US DOT guidance is to suggest a balance that ensures meaningful access by LEP persons to critical services while not imposing undue burdens on small organizations and local governments. Smaller recipients with limited budgets are typically not expected to provide the same level of language service as larger recipients with larger budgets; this is the case for JEFFTRAN which operates on a relatively small and constrained budget.

The DOT guidance is modeled after the Department of Justice's guidance recommendations and requires recipients and sub recipients to take steps to ensure meaningful access to their programs and activities to LEP persons. More information for recipients and sub recipients can be found at <http://www.lep.gov>. This plan uses the recommended four-factor analysis to form an individualized assessment of the JEFFTRAN LEP plan considering the factors outlined above.<sup>5</sup> Each of the following factors is examined to determine the level and extent of language assistance measures required to sufficiently ensure meaningful access to public transit services within Jefferson City. Recommendations are then based on the results of the analysis.

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<sup>4</sup> [http://www.lep.gov/resources/lep\\_aug2005.pdf](http://www.lep.gov/resources/lep_aug2005.pdf); FTA Circular C4702.1B.

<sup>5</sup> Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons. Federal Register: December 14, 2005 ([Volume 70, Number 239](#)).

Factor 1: The Proportion, Numbers and Distribution of LEP Persons. The Census Bureau has a range of four classifications of how well people speak English. The classifications are ‘very well,’ ‘well,’ ‘not well,’ and ‘not at all.’ For planning purposes, this plan considers people that speak English less than “very well” as Limited English Proficient persons.

Table 1 shows the estimate, percent and margins of errors of persons in regards to their English language skills for Jefferson City, Missouri. Review of the data in Table 1 reveals that approximately 1.3% (541 people) of the total Jefferson City population over 5 years of age speak English less than “very well.” Appendix D (2010-2014 American Community Survey Table B16004) reveals that the largest LEP community identified within Jefferson City is the Spanish-speaking community.

**Table 1: Limited English Proficient Persons in Jefferson City.<sup>6</sup>**

Subject	Jefferson City city, Missouri			
	Estimate	Margin of Error	Percent	Percent Margin of Error
LANGUAGE SPOKEN AT HOME				
Population 5 years and over	40,561	+/- 224	40,561	(X)
English only	38,431	+/- 492	94.70%	+/- 1.0
Language other than English	2,130	+/- 424	5.30%	+/- 1.0
Speak English less than "very well"	541	+/- 237	1.30%	+/- 0.6
Spanish	748	+/- 263	1.80%	+/- 0.6
Speak English less than "very well"	164	+/- 89	0.40%	+/- 0.2
Other Indo-European languages	585	+/- 221	1.40%	+/- 0.5
Speak English less than "very well"	242	+/- 205	0.60%	+/- 0.5
Asian and Pacific Islander languages	339	+/- 100	0.80%	+/- 0.2
Speak English less than "very well"	94	+/- 64	0.20%	+/- 0.2
Other languages	458	+/- 185	1.10%	+/- 0.5
Speak English less than "very well"	41	+/- 38	0.10%	+/- 0.1

Factor 2: Frequency of Contact with LEP Individuals. Appendix F compares the results from 2011, 2013 and 2015 surveys which detail the frequency of contact with LEP individuals by JEFFTRAN drivers. Based on the 2013 survey, it is estimated that there were 3,250 contacts out of a yearly total ridership of 357,256, or approximately 1.4%. The 2015 survey showed 3,329 contacts and the 2015 yearly total ridership was 257,748, or approximately 1.3%.

Factor 3: The Nature and Importance of the Program, Activity, or Service to LEP Community. As an agency providing public transportation inside the Jefferson City corporate limits, JEFFTRAN participates heavily in public outreach. JEFFTRAN holds bi-monthly meetings to foster communication with customers and stakeholders. JEFFTRAN strives to meet the needs of its client base to make sure that all segments of the population, including LEP persons, have the opportunity to utilize public transit. Denial or delay of access to services or information provided by JEFFTRAN would not have life-threatening

<sup>6</sup> Table 1 is derived from *Table DP02, Selected Social characteristics in the United States* from the 2010-2014 American Community Survey 5-Year Estimates.



implications for a LEP individual. It is also believed that denial or delay of access to services or information provided by JEFFTRAN would not have serious implications on a LEP individual, especially compared to the services, such as health, emergency transportation, water, sewer, fire protection, police protection and other emergency services, provided by other local governments or organizations.

Factor 4: The Resources Available to JEFFTRAN and Overall Cost. US Department of Transportation Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons published in the Federal Register: December 14, 2005 (Volume 70, Number 239) states: *“Certain DOT recipients, such as those serving very few LEP persons or those with very limited resources, may choose not to develop a written LEP plan.”* While JEFFTRAN does serve few LEP persons and has very limited resources, the decision has been made to develop a written Limited English Proficiency Plan because demographic trends indicate the number of LEP persons may increase within the area. Funds available for LEP services at the present time are derived entirely from existing operating funds, and compete with other operational requirements of JEFFTRAN.

#### **IV. Language Assistance Plan**

All Languages. Information on language services will be provided to community based organizations and stakeholders of JEFFTRAN services, including the availability of language assistance services, with notice. Language assistance will be provided for all languages in the following manner:

With advance notice of three (3) calendar days, provide interpreter services at Transit Advisory Committee and other public meetings. Interpreter services offered include foreign language and hearing impaired.

Include in outreach documents, including notices, a statement that interpreter services are available at meetings, with three (3) days advance notice.

Utilize a database of interpreters, primarily, but not exclusively, based on the Missouri Office of Administration cooperative purchasing agreement for translation services and verbal interpretation.

Assistance Activities for Spanish Language. The USDOT LEP guidance provides that once an agency has decided, based on the “Four Factors” that it will provide language services, it is important that the agency notify LEP persons of the services available free of charge, and in the languages LEP persons would understand. To this end JEFFTRAN will provide statements in public information and public notices that language assistance or special accommodations will be provided to persons, with reasonable advance notice to JEFFTRAN. The following assistance will be provided for Spanish language:

The text portion of the JEFFTRAN Route & Schedule Guide is published in Spanish, and is available in hard copy format or via the JEFFTRAN website.

Notices of bus route or time changes are provided in English and Spanish. These notices are posted in buses, in shelters, at the JEFFTRAN office, and posted on the JEFFTRAN website.

Title VI complaint forms are published in English and Spanish, and are available at public meetings, and at the locations cited in Section VII.

JEFFTRAN staff will be trained on protocols for providing access to services for LEP persons.

#### **V. Monitoring, Evaluation, and Updates to JEFFTRAN Language Plans**

JEFFTRAN will monitor the frequency with which contact is made with LEP persons by program area. Data will be collected for each of the following program areas to document the number of LEP persons and languages spoken, who come into contact with JEFFTRAN's bus and paratransit services:

.....	P
urchase of passes and tickets at each location available	
.....	P
articipation at public meetings	
.....	C
ustomer service interactions, including dispatch and office interactions	
.....	D
river surveys	

## **VI. Employee Training for Language Assistance to LEP Populations**

JEFFTRAN staff is trained on protocols for providing access to services for LEP persons, and is provided with a copy of the LEP and are provided the following language assistance materials:

The publication entitled, *Basic Spanish for Transit Employees*, obtained from the Colorado Department of Transportation, is distributed to and retained in all transit vehicles (Appendix G). *Basic Spanish for Transit Employees* is also retained on CD in the JEFFTRAN Administrative offices so that other transit employees may utilize this publication. JEFFTRAN retains copies of “I Speak” language assistance cards for placement in each transit vehicle and at each location where transit patrons are provided assistance, including customer service windows.

JEFFTRAN staff will be educated on the procedures and services available during the JEFFTRAN staff orientation process for new hires. Training topics will include:

- Understanding the Title VI LEP program responsibilities;
- What language assistance JEFFTRAN offers;
- How to access an interpreter;
- Documentation of language assistance requests;
- How to handle a complaint;

The importance of educating *JEFFTRAN* staff on *JEFFTRAN*’s LEP program responsibilities and their obligation to provide language assistance.

## **VII. Access to JEFFTRAN Plans**

Persons, agencies and community partners may access JEFFTRAN’s plans, including the Title VI, LEP and Public Involvement plans through any of the following ways. A copy will be provided to any person or agency requesting same.

### During Regular Business Hours:

City of Jefferson, Missouri: Office of the City Clerk  
 John G. Christy Municipal Building – City Hall  
 320 East McCarty Street  
 Jefferson City, Missouri 65101

JEFFTRAN Administrative Offices  
 Charles G. Robinson Transit Facility  
 820 E. Miller Street  
 Jefferson City MO 65101

Telephone: (573) 634-6477  
Email: [jctransit@jeffcitymo.org](mailto:jctransit@jeffcitymo.org)

Internet Access

JEFFTRAN webpage, [www.jeffcitymo.org/transit](http://www.jeffcitymo.org/transit)

## **VIII. Safe Harbor Stipulation**

Federal law provides a “Safe Harbor” stipulation so that recipients can ensure with greater certainty that they comply with their obligations to provide written translations in languages other than English. A “Safe Harbor” means that if a recipient provides written translations (as under circumstances outlined in paragraphs A and B of the publication *Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons*<sup>7</sup>) such action will be considered strong evidence of compliance with the recipient's written-translation obligations under Title VI. Strong evidence of compliance with the recipient's written-translation obligations under ‘Safe Harbor’ includes providing written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered. Translation of other documents, if needed, can be provided orally. The failure to provide written translations under the circumstances does not mean there is noncompliance, but rather provides a guide for recipients that would like greater certainty of compliance than can be provided by a fact-intensive, four-factor analysis. For example, even if a Safe Harbor is not used, if written translation of a certain document(s) would be so burdensome as to defeat the legitimate objectives of its program, it is not necessary. Other ways of providing meaningful access, such as effective oral interpretation of certain vital documents, might be acceptable under such circumstances. This Safe Harbor provision applies to the translation of written documents only. It does not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable.

No LEP language group in Jefferson City constitutes the population threshold (5% or 1,000 persons) for which written translations of vital documents are required, and given the small number of LEP language group members, the JEFFTRAN budget and the number of staff, it is deemed that written translations of all but a few core documents would be so burdensome as to defeat the legitimate objectives of our programs.

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<sup>7</sup> Federal Register: June 18, 2002 (Volume 67, Number 117).

## **SECTION THREE. PUBLIC INVOLVEMENT**

### **I. Introduction**

JEFFTRAN and the City of Jefferson follow a public involvement process that addresses the following issues: participation, access to meetings, access to information, notice of hearings, public hearings, public comments. It is the intent of the City Council of the City of Jefferson, Missouri, to encourage the receipt of public comments as part of the decision-making process.

This plan recognizes that as the elected governing body of City of Jefferson, the City Council has the ultimate responsibility and authority for adoption and implementation of policies affecting JEFFTRAN.

### **II. Encouragement of Citizen Participation**

The following groups and organizations have been identified as partners in transportation planning and decision-making.

- Citizens
- Minority and low-income populations
- Persons with Limited English Proficiency
- Elderly, disabled, and persons with limited mobility
- Residents of public and assisted housing developments
- Agencies serving persons with transportation needs
- Community organizations with an interest in public transportation
- Businesses whose customers ride JEFFTRAN

All citizens, including stakeholders named above, are encouraged to participate. Meetings are open to the public and are scheduled at times and locations convenient to transit riders with accommodations for persons with disabilities and assistance for persons with Limited English Proficiency available as needed.

Bi-monthly Transit Advisory Committee meetings hosted by JEFFTRAN staff. Transit Focus Group meetings were initiated in 2007 and transitioned to the Transit Advisory Committee in 2015. All transit patrons and others interested in transit are invited to attend. Meetings dates/time are posted on the Transit website and Facebook page.

Annual Program of Projects (part of the Transportation Improvement Program or TIP) published through the Capital Area Metropolitan Planning Organization (CAMPO).

Transit patrons may also remain engaged and informed in the following ways:

Cell phone App. A cell phone application became available in 2013 so that patrons may track the locations of their buses via cell phone.

Press Releases. Press releases are sent to local news media when coverage of specific events or decisions is warranted.

Opportunities for public comment. The City of Jefferson routinely offers several ways for people to comment on activities, programs and decisions made. Comments are accepted via an online comment form, by phone, fax, email and in person at City Council meetings or at Transit Advisory Committee meetings

Formal public comment periods. Formal public comment periods are used to solicit comments on major service reductions and fare increases.

Staff is accessible in person, or phone, email, mail, fax, or by online comment forms. Contact information is provided on the JEFFTRAN webpage and Facebook page.

Website: The City's homepage and JEFFTRAN websites includes "Announcements" that are updated regularly. The JEFFTRAN webpage includes information on programs, publications, press releases, contact information for staff, a search function, Plans, including the Title VI Plan and complaint procedures

### **III. Targeted Public Participation Plan for Minority, Low-Income and LEP Populations**

Minority, low-income and LEP persons are made aware of JEFFTRAN activities and events that have an impact on JEFFTRAN services through notification of agencies serving these persons, and by making announcements available in a variety of formats, including print, broadcast media and internet announcements.

Activities and meetings are held in accessible buildings located on JEFFTRAN bus routes. Times of open houses or meetings are scheduled to span late afternoon and early evening hours. Comments are also taken by mail, email, fax, telephone and in person.

JEFFTRAN seeks input from community leaders and organizations. To facilitate involvement of traditionally underserved populations, community leaders and organizations that represent these groups are consulted about how to most effectively reach their members. Relationships with these groups are maintained for future partnerships in the planning process.

Provide services for the disabled. Upon advance notice, deaf interpreters, translators and Braille documents can be provided for public meetings. Notifications of opportunities for public involvement will include contact information for people needing these or other special accommodations. Requests must be made at least three (3) business days in advance.

Be sensitive to diverse audiences. At public meetings, staff will attempt to communicate effectively, and avoid technical jargon. Staff will dress and conduct themselves appropriately.

### **IV. Transit Notice Posting and Publishing**

- (1) Printed notices are posted in English and Spanish at the following locations:

- In all buses
- Affixed to bus shelters
- Housing Authority's Housing Office at 1020 Myrtle Street, Lower Level
- Dulle-Hamilton Towers at 10 Jackson Street and 12 Jackson Street
- Veteran's Administration Clinic
- Missouri River Regional Library

- (2) Transit notices are also provided by mail or email to:

- Division of Family Services
- Central Missouri Community Action Agency
- Samaritan Center
- Schools ( public, private, and special learning centers)
- Local chapter of the NAACP

- (3) Media notices. JEFFTRAN shall notify the general public of Transit-related issues and events through notification of print and broadcast media, through established methods, including a media email group, which includes the News Tribune newspaper, KLIK



and KWOS radio, and KRCG-TV, the City of Jefferson website, JEFFTRAN website and the JEFFTRAN Facebook page.

**V. Annual Program of Projects**

As a provider of transit services and recipient of FTA Section 5307 funds, JEFFTRAN complies with the public participation requirements of Section 5307(c)(1) through 5307(c)(7). Each grantee is required to develop, publish, afford an opportunity for a public hearing on, and submit for approval a Program of Projects (POP).

JEFFTRAN coordinates with the Capital Area MPO to satisfy the Program of Projects public hearing requirements. When the Capital Area MPO develops a Transportation Improvement Program (TIP) publication of the POP is included, and the Program of Projects is developed concurrently with the Transportation Improvement Program (TIP).

Capital Area MPO/Department of Planning and Protective Services  
City of Jefferson, Missouri/City Hall  
Room 120, John G. Christy Municipal Building  
320 E. McCarty Street  
Jefferson City, MO 65101  
Phone: 573-634-6410  
jcplanning@jeffcitymo.org

**VI. Procedure for Involving the Public When Contemplating Major Transit Service Changes**

A. Major service changes, including fare increases and major transit service reductions, as defined below are subject to public hearings before the City Council. Major Transit Service Reductions also require the preparation of “A Level and Quality of Service Analysis.” The Level and Quality of Service Analysis shall be provided to the City Council prior to the Council’s public hearing.

B. Public Meeting Notices and Corresponding Public Comment Period Requirements.

(1) Required Notices.

- (a) Two notices shall be published as “display ads” in the News Tribune advertising the subject, date, time and place of the City Council’s public hearing. The notice shall include instructions on how to direct written comments prior to the hearing date. The first notice shall be published at least 30 calendar days in advance of the public hearing; a second notice shall be published at least 10 calendar days in advance of the public hearing.
- (b) Notice of the public hearing shall be forwarded to the City Clerk for posting concurrently with publication of the legal notices.
- (c) Printed notices shall be posted at the locations and in the manner provided for in Section IV, above.
- (d) Other notices. Other notices may be provided to individuals and groups.

(2) Public Hearing. The Council shall hold at least one public hearing at a Council meeting. The public hearing shall be held at City Hall, 320 E. McCarty Street, Jefferson City, MO 65101 or as specified within public hearing notice(s). Public hearings shall be conducted according to the Council’s Rules of Procedures, and shall

include receipt of public comments.

- C. Major Transit Service Reductions. Major Transit Service Reductions require the preparation of "A Level and Quality of Service Analysis" that contains the elements outlined in Paragraph E. The Level and Quality of Service Analysis shall be provided to the City Council prior to the public hearing on the matter. Major Transit Service Reduction includes the following:
- (1) Elimination or reduction in service that affects 5 or more passengers;
  - (2) Elimination of routes or system wide route restructuring;
  - (3) Any aggregate reduction of 25 percent or more of the number of transit REVENUE MILES of a route computed on a daily basis for the day of the week for which the change is proposed;
  - (4) Level of service changes which may result in a disproportionately high and adverse impact to minority communities as referenced in FTA Circular 4702.1, even though they do not meet the threshold for a major service reduction. Such changes are subject to a Level of Service Review as described in Paragraph 8.
  - (5) EXCEPTIONS. The following service variations do not constitute major service reductions and may be implemented without public hearings. Every effort will be made to provide as much advance notice as possible to transit patrons through the news media, and notice procedures described in Section IV.
    - (a) Standard seasonal variations, including implementation of pre-established snow routes;
    - (b) Emergency service changes, including changes in routes or service frequencies necessitated by street closures, the ability of transit vehicles to travel on public streets or a disaster which severely impairs public health or safety.
- D. Fare Increases. The following fares and amendments are subject to public hearing:
- (1) Any increase in charges or fees assessed to transit riders for use of public transit services including cash fares, ticket fares, pass fares and transfer fares;
  - (2) Amendments to eligibility for fare categories; except that reduced fares or promotional fare adjustments shall not be subject to public hearings. "Promotional fares" shall include modifications to fare structures which are established on a short-term basis for the specific purpose of promoting service and encouraging ridership.
- E. Level and Quality of Service Change Analysis. A Level and Quality of Service Analysis shall be provided for the Major Service Reductions listed in Paragraph 6 above.
- A. The service to minority communities shall be evaluated in terms of overall system standards to determine if a proposed change would result in disproportionately high and adverse impacts to minority communities.
  - B. This analysis shall include the identification of minority census tracts for purposes of comparing outcomes in those areas to transit service provided in other areas of the City. Not all service changes will result in adverse impacts, however. For example, eliminating a route that runs every 30 minutes from a street that already has service every 30 minutes and otherwise meets the system standards would not warrant further analysis.
  - C. Evaluation criteria. The Level and Quality of Service Analysis shall utilize the following evaluation criteria. For purposes of comparison the three most traveled routes and destinations shall constitute the standard by which the proposed changes are to be evaluated. The evaluation should identify and compare any changes in the following criteria within the standard routes and the affected minority neighborhoods:

- (1) Number of riders affected
- (2) Travel time
- (3) Number of transfers
- (4) Service frequency
- (5) Span of service
- (6) Walk distance to bus route
- (7) Average peak hour travel time to destination
- (8) Total cost of trip to destination

D. Mitigation of Impacts. Service changes that would result in adverse or disproportionate impacts on minority communities shall be reported in the Analysis. This report shall provide a description of the mitigations, options and alternatives to be considered in conjunction with the proposed service change, such as:

- (1) Alternatives to the service proposal that would have fewer negative impacts and the rationale for not selecting them;
- (2) Transit options that would be available for riders who would be negatively affected; and
- (3) Measures to avoid, minimize or mitigate the negative impacts of the proposed service change in the affected area.

## **VII. Access to Records**

The City of Jefferson shall provide citizens, public agencies, and other interested parties with reasonable and timely access to information and records relating to JEFFTRAN and the City's use of FTA funding. Copies of the adopted budget and Consolidated Annual Financial Reports that include information on JEFFTRAN are maintained by the Finance Department and available for public inspection Monday through Friday, 8:30 a.m. – 4:30 p.m. or on the City's webpage at <http://www.jeffersoncitymo.gov/government/finance.php>.

## *Appendix A*

### **Notifying the Public of Rights Under Title VI**

#### **JEFFTRAN Title VI Notice**

Notifying the Public of Rights Under Title VI

JEFFTRAN, CITY OF JEFFERSON, MISSOURI

JEFFTRAN is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI of the Civil Rights Act of 1964. Any person who believes he or she has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with JEFFTRAN, the City of Jefferson, Missouri.

For more information on the civil rights program and the procedures to file a complaint visit <http://www.jeffersoncitymo.gov/Transit/Title%20VI%20complaint%20form%20from%20RS2013-14-Adopted%20JeffTran%20LEP-TitleVI-PIP-2013%20extracted%202-23-16.pdf> or [http://www.jeffersoncitymo.gov/government/transit/title\\_vi.php](http://www.jeffersoncitymo.gov/government/transit/title_vi.php) or contact the Title VI Coordinator by calling (573) 634-6570.

A complainant may file a complaint directly with the Federal Transit Administration by contacting: Federal Transit Administration, Office of Civil Rights, Attention: Title VI Program Coordinator; East Building, 5<sup>th</sup> Floor-TCR; 1200 New Jersey Ave., SE; Washington DC 20590.

#### **JeffTran Título VI Aviso**

Notificación al Público de los Derechos Bajo el Título VI

JEFFTRAN, CIUDAD DE JEFFERSON, MISSOURI

JeffTran se compromete a garantizar que ninguna persona sea excluida de participar en, o negado los beneficios de sus servicios de transporte sobre la base de raza, color u origen nacional, tal como está protegida por el Título VI del Acta de Derechos Civiles de 1964. Cualquier persona que crea que ha sido perjudicada por una práctica discriminatoria ilegal bajo el Título VI puede presentar una queja ante la JeffTran, Ciudad de Jefferson, Missouri.

Para más información sobre el programa de derechos civiles y los procedimientos para presentar una visita <http://www.jeffersoncitymo.gov/Transit/Title%20VI%20complaint%20form%20from%20RS2013-14-Adopted%20JeffTran%20LEP-TitleVI-PIP-2013%20extracted%202-23-16.pdf> o [http://www.jeffersoncitymo.gov/government/transit/title\\_vi.php](http://www.jeffersoncitymo.gov/government/transit/title_vi.php) queja o póngase en contacto con el Título Coordinador VI llamando al (573) 634-6570.

El demandante puede presentar una queja directamente con la Administración Federal de Transporte poniéndose en contacto con : Administración Federal de Tránsito , Oficina de Derechos Civiles , Atención: Coordinador del Programa Título VI ; Edificio Este , 5ª Planta -

TCR ; 1200 New Jersey Ave. , SE; Washington DC 20590.



### ***JEFFTRAN* Title VI Complaint Procedures (Page 1/2)**

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color or national origin in programs receiving federal financial assistance.

#### **GENERAL**

Any person who believes that he or she, individual, or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, or national origin as noted below may file a written complaint with the Title VI Program Coordinator, c/o City Counselor, City of Jefferson, Missouri; John G. Christy Municipal Building/City Hall; 320 E. McCarty Street, Jefferson City, Missouri 65101. Complainants have the right to complain directly to the appropriate federal agency. Every effort will be made to obtain early resolution of complaints. The option of informal meeting(s) between the affected parties and the Title VI Program Coordinator may be utilized for resolutions. The Title VI Program Coordinator will notify *JEFFTRAN* of all Title VI related complaints as well as resolutions.

#### **PROCEDURE**

1. The complaint must meet the following requirements:
  - a. Complaint shall be in writing and signed by the complainant(s). In cases where Complainant is unable or incapable of providing a written statement, a verbal complaint may be made. The Title VI Program Coordinator will interview the Complainant and assist the person in converting verbal complaints to writing. All complaints must, however, be signed by the Complainant or his/her representative.
  - b. Include the date of the alleged act of discrimination when the Complainant(s) became aware of the alleged act of discrimination; or the date on which that conduct was discontinued or the latest instance of conduct.
  - c. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complaint.
  - d. Federal and state law requires complaints be filed within 180 calendar days of the alleged incident.
2. Upon receipt of the complaint, the Title VI Program Coordinator will determine its jurisdiction, acceptability, need for additional information, and investigate the complaint, if accepted.
3. The Complainant will be provided with a written acknowledgement that *JEFFTRAN* has either accepted or rejected the complaint.
4. A complaint must meet the following criteria for acceptance:
  - a. The Complaint must be filed within 180 days of the alleged occurrence.
  - b. The allegation must involve a covered basis such as race, color or national origin.
  - c. The allegation must involve a *JEFFTRAN* service, the City of Jefferson as a federal-aid recipient, or its sub-recipient or contractor.
5. A complaint may be dismissed for the following reasons:
  - a. The Complainant requests the withdrawal of the complaint.
  - b. The Complainant fails to respond to repeated requests for additional information needed to process the complaint.
  - c. The Complainant cannot be located after reasonable attempts.

*Appendix B*

***JEFFTRAN* Title VI Complaint Procedures (Page 2/2)**

6. Once the Title VI Program Coordinator decides to accept the complaint for investigation, the Complainant will be notified in writing of such determination. The Complaint will receive a case number and will then be logged in a database identifying Complainant name, basis, alleged harm, race, color and national origin of the Complainant.
7. In cases where the Title VI Program Office assumes the investigation of the complaint within 90 calendar days of the acceptance of the complaint the Title VI Program Coordinator will prepare an investigative report. The report shall include a narrative description of the incident, identification of persons interviewed, findings and recommendations for disposition.
8. The investigative report and its findings will be reviewed with *JEFFTRAN* officials and in some cases the investigative report and findings will be reviewed by *JEFFTRAN*'s Legal Counsel.
9. The Title VI Program Coordinator/Legal Counsel will make a determination on the disposition of the complaint. Dispositions will be stated as follows:
  - a. In the event *JEFFTRAN* is in noncompliance with the Title VI regulations remedial action will be listed.
10. Notice of the Title VI Program Coordinator's determination will be mailed to the Complainant. Notice shall include information regarding appeal rights of Complainant and instructions for initiating such an appeal. Notice of appeals are as follows:
  - a. The Title VI Program Coordinator will reconsider the determination, if new facts, come to light.
  - b. If Complainant is dissatisfied with the determination and/or resolution set forth by the Title VI Program Coordinator, the same complaint may be submitted to the FTA for investigation. Complainant will be advised to contact:

Federal Transit Administration, Office of Civil Rights  
Attention: Title VI Program Coordinator  
East Building, 5<sup>th</sup> Floor – TCR  
1200 New Jersey Ave., SE  
Washington, DC 20590
11. A copy of the complaint and the Title VI Program Coordinators investigation report/letter of finding and Final Remedial Action Plan, if appropriate, will be issued to FTA within 120 days of the receipt of the complaint.
12. A summary of the complaint and its resolution will be included as part of the Title VI updates to the FTA.

*Appendix C*

***JEFFTRAN Title VI Complaint Form (Page 1/2)***

*JEFFTRAN* is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color or national origin, as provided by the Title VI of the Civil Rights Act of 1964, as amended. Title VI complaints must be filed within 180 days from the date of the alleged discrimination.

The following information is necessary to assist us in processing your complaint. If you require any assistance in completing this form, please contact the Title VI Program Coordinator.

**Title VI Program Coordinator  
c/o City Counselor, City of Jefferson, Missouri  
John G. Christy Municipal Building/City Hall  
320 E McCarty Street  
Jefferson City, MO 65101  
Phone 573-634-6570 or 573-634-6304**

***This completed form must be returned to the Title VI Program Coordinator at the above address.***

Your Name:	
Street Address/Apartment Number:	
City, State & ZIP Code:	
Phone:	Alt. Phone:
Person(s) discriminated against (if someone other than complainant): Name(s):	
Street Address, City, State & Zip Code:	

***Please continue on Page 2***

*Appendix C, continued*  
**JEFFTRAN Title VI Complaint Form (Page 2/2)**

1. Date of Incident \_\_\_\_\_

2. Which of the following best describes the reason the alleged discrimination took place? (Circle one)

Race

Color

National Origin (or Limited English Proficiency)

3. Please describe the alleged discrimination incident. Provide the names and titles of *JEFFTRAN* employees if available. Explain what happened and whom you believe was responsible. Please continue on the next page, and use the back of this form if additional space is required. \_\_\_\_\_

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4. Have you filed a complaint with any other federal, state or local agencies? (Circle one) Yes / No

If yes, what agencies:

Agency: \_\_\_\_\_

Contact Name: \_\_\_\_\_

Address: \_\_\_\_\_

Phone: \_\_\_\_\_

Agency: \_\_\_\_\_

Contact Name: \_\_\_\_\_

Address: \_\_\_\_\_

Phone: \_\_\_\_\_

5. I affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

Complainant's Signature

Date

Print or Type Name of Complainant

*Your Rights in Title VI Non-discrimination Complaints*

*Filing this complaint with the City of Jefferson Title VI Program Coordinator does not prevent you from filing a complaint with the Federal Agency providing funding to the party against which a complaint is being lodged.*

*For additional information or location of state and federal offices contact the Title VI Program Officer.*



*Appendix D*  
**2000-2014 American Community Survey, Table B16004**

	Jefferson City city,	
	Estimate	Margin of
Total:	40,561	+/-224
5 to 17 years:	6,636	+/-358
Speak only English	6,425	+/-363
Speak Spanish:	102	+/-65
Speak English "very well"	69	+/-57
Speak English "well"	15	+/-18
Speak English "not well"	18	+/-29
Speak English "not at all"	0	+/-23
Speak other Indo-European	90	+/-79
Speak English "very well"	50	+/-57
Speak English "well"	40	+/-61
Speak English "not well"	0	+/-23
Speak English "not at all"	0	+/-23
Speak Asian and Pacific Island	19	+/-28
Speak English "very well"	19	+/-28
Speak English "well"	0	+/-23
Speak English "not well"	0	+/-23
Speak English "not at all"	0	+/-23
Speak other languages:	0	+/-23
Speak English "very well"	0	+/-23
Speak English "well"	0	+/-23
Speak English "not well"	0	+/-23
Speak English "not at all"	0	+/-23
18 to 64 years:	28,180	+/-385
Speak only English	26,330	+/-552
Speak Spanish:	646	+/-223
Speak English "very well"	515	+/-204
Speak English "well"	88	+/-60
Speak English "not well"	41	+/-51
Speak English "not at all"	2	+/-6
Speak other Indo-European	448	+/-156
Speak English "very well"	246	+/-92
Speak English "well"	188	+/-147
Speak English "not well"	14	+/-23
Speak English "not at all"	0	+/-23
Speak Asian and Pacific Island	302	+/-83
Speak English "very well"	226	+/-69
Speak English "well"	47	+/-42
Speak English "not well"	15	+/-25
Speak English "not at all"	14	+/-21
Speak other languages:	454	+/-181
Speak English "very well"	417	+/-178
Speak English "well"	16	+/-24
Speak English "not well"	21	+/-26
Speak English "not at all"	0	+/-23
65 years and over:	5,745	+/-266
Speak only English	5,676	+/-266
Speak Spanish:	0	+/-23
Speak English "very well"	0	+/-23
Speak English "well"	0	+/-23
Speak English "not well"	0	+/-23
Speak English "not at all"	0	+/-23
Speak other Indo-European	47	+/-48
Speak English "very well"	47	+/-48
Speak English "well"	0	+/-23
Speak English "not well"	0	+/-23
Speak English "not at all"	0	+/-23
Speak Asian and Pacific Island	18	+/-26
Speak English "very well"	0	+/-23
Speak English "well"	18	+/-26
Speak English "not well"	0	+/-23
Speak English "not at all"	0	+/-23
Speak other languages:	4	+/-10
Speak English "very well"	0	+/-23
Speak English "well"	4	+/-10
Speak English "not well"	0	+/-23
Speak English "not at all"	0	+/-23

## Spanish Text JEFFTRAN Route &amp; Schedule Guide



## Guía de Ruta y Calendario

## Cómo utilizar JEFFTRAN

Usted puede coger el autobús en cualquier parada de autobús marcada por el conductor del pabellón. Paradas en las intersecciones, donde SEGURO, también se hará.

## Información de tarifas

Tarifa fija de carreteras	\$1.00	Pase Paseo estudiante 20	\$18.00	Handi-Wheels Tarifa	\$2.00
Transferencias	Libre	Adultos 20 Paseo Pase	\$20.00	Handi-Llantas 10 Pase Paseo	\$20.00
Niños menores de 6 años con un adulto	Libre	Reducida / Pase Tarifa Media	\$10.00		

Un **Billete de Precio Reducido / Tarifa Media Pass** es ofrecido en rutas fijas para las personas y más de 60 años de edad, persona con discapacidad y los titulares de tarjetas de Medicare. **Estudiante, la Reducción de las Tarifas y Pases de Adultos** están disponibles a partir de los conductores en la ruta regular de autobuses. Las solicitudes de **Reducción de las Tarifas de Programa y Handi-Wheels Servicio** están disponibles en el sitio web JEFFTRAN y JEFFTRAN de la ventana y Servicio al Cliente del Ayuntamiento (vea la página 3 para los tiempos y las direcciones). Todos los pases pueden comprarse también en esos dos lugares. Por favor tenga en cuenta, sólo el Ayuntamiento de ubicación puede tramitar las solicitudes de precio reducido y Tarjetas de crédito / tarjeta de débito compras. Subvencionables los clientes pueden solicitar una **Reducción de las Tarifas** por prestación de paso de foto-identificación, prueba de elegibilidad y la terminación de la JEFFTRAN Solicitud de **Tarifa Reducida-Pase**. Exacto de la tarifa única, los conductores no hacen el cambio.

## Instrumento de Transferencia

Si necesita usar más de una ruta para llegar a su destino, pídale a su conductor para un traslado que usted bordo. Conexiones entre las rutas se realizan en el **Instrumento de Transferencia** ubicado en 820 E. Miller St.

## Horas de Operación

JEFFTRAN opera durante todo el año, de lunes a viernes 6:45 AM a 5:30 PM, excepto en los siguientes días festivos: Día de Año Nuevo, Día de Martin Luther King Jr., de Truman Cumpleaños, Memorial Day, 4 de julio, Día del Trabajo, Día de los Veteranos, de Gracias y el día después, y el día de Navidad. En condiciones meteorológicas extremas (hielo o nieve pesada), JEFFTRAN autobuses operan en el Tiempo Calendario de emergencia Flex. JEFFTRAN NO cancelar el servicio a menos que se consideran las principales calles intransitables. Si el servicio se está ejecutando en el tiempo de emergencia Flex Lista, o cancelado, será anunciado a través de los medios de comunicación locales (emisoras de radio: KATI, KPAL, KJLU, KJMO, KMFC, KPLA, KTXV, y KWOS o estaciones de televisión: JCTV, KMIZ, KNLI, KOMU y KRCG) y de la Información a través de correo electrónico JEFFTRAN Grupo. También puede llamar al 573-634-6477 para JEFFTRAN servicio de información.

## El Acceso a Personas con Discapacidad

Todas las rutas de autobuses están equipados ascensor o rampa, a pesar de todas las paradas de autobús no son accesibles para sillas de ruedas. JEFFTRAN también ofrece servicio Paratransit. Véase la página 3 para información adicional.

## Complejo Capitol Shuttle

Servicio de autobuses de enlace está disponible en el Estado de Empleados Shuttle lote Industrial en 1635 el Dr. al Capitolio y el Complejo de la antigua Complejo Penitenciario parking a 102 N. Castaño a la Oficina de Lewis & Clark edificio (DNR) en Riverside y la Dra. Complejo del Capitolio a partir de las 7:00 AM hasta las 5:30 PM., de lunes a viernes todos los días que las oficinas estén abiertas.

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## Handi-Wheels Paratransit Servicio de Autobuses

Handi-Wheels es una acera a acera, el origen al destino Paratransit servicio de transporte. El servicio ofrece el transporte a las personas que a causa de la discapacidad no puede viajar hacia o desde una parada de autobús de ruta fija. Handi-Wheels nuestro servicio y los conductores están formados por expertos dedicados a la seguridad el transporte de discapacitados y pasajeros con necesidades especiales. ADA aprobó Handi-Wheels furgonetas característica planteadas techos, elevadores para sillas de ruedas y los sistemas de retención, así como confortables asientos para los asistentes ambulatoria y compañeros. Handi-Llantas de aplicaciones y servicios de las descripciones detalladas están disponibles en estándar de impresión y formatos accesibles de los lugares enumerados en la parte inferior de esta página.

### Guía de Viaje

*Por favor, sea cortés a sus compañeros de viajeros por las siguientes directrices*

1. Llegar a la parada 5 minutos antes de la estimación de tiempo o de llegada de su autobús. Aunque los conductores hacer un esfuerzo para operar en el plazo previsto, los tiempos pueden variar debido a circunstancias imprevistas.
2. Espere a que el autobús en las paradas de autobús marcado cuando sea posible, o en las intersecciones donde seguro. El conductor no se detenga en lugares inseguros.
3. Cuando el embarque estará listo con su pase o el cambio exacto. Esto acelera el proceso de embarque y se le en su camino más rápido.
4. Pregunte por las transferencias al subir.
5. No hablar o distraer al conductor mientras el autobús está en movimiento.
6. Por favor, ofrecer asientos a personas mayores o discapacitadas.
7. Cochecitos de bebé o tomar carritos de la compra a la parte posterior del autobús. Por favor, cochecitos y carros veces siempre que sea posible.
8. Paquetes y cajas que se pueden llevar en un viaje, mientras que el embarque y el ajuste en el regazo o en la sede se les permite.
9. Armas, productos químicos tóxicos, materiales inflamables, grandes embalajes, muebles de madera y no se permiten en el autobús.
10. Desordenada o personas en estado de embriaguez no se les permite viajar en el autobús.
11. No están en el paso posterior de la zona.
12. No permanecer de pie o colocar sus pies en los asientos.
13. Mantenga la cabeza, brazos, manos, etc dentro de la ventana y salir de los pasillos.
14. Abrir los contenedores de bebidas, comer, beber, uso de los productos del tabaco están estrictamente prohibidos en los autobuses.
15. Reproducción de radios, reproductores de mp3, etc que pueden ser escuchados por los demás pasajeros están estrictamente prohibidos en los autobuses.
16. El conductor de señal (tirar de la señal de solicitud de parada) una cuadra antes de que desea bajar del autobús.
17. Manténgase sentado hasta que el autobús ha llegado a una parada completa.
18. si es necesario estar de pie, permanezca detrás de las líneas blancas piso de seguridad en la parte delantera del autobús.
19. Por favor, salga por las puertas de atrás.
20. Exacto de la tarifa única, los conductores no hacen el cambio.

### Lenguaje Abusivo o Acciones

JEFFTRAN quiere asegurar que todos los pasajeros tienen un seguro y agradable paseo. Lenguaje ofensivo o acciones no serán toleradas en el autobús. Ofensivo o abusivo de los pasajeros serán retirados de los autobuses y, si es necesario, puede ser prohibido en el autobús por un período prolongado. Cada autobús está equipado con cámaras de vídeo y grabadores de cinta que toda la actividad en el autobús, que pueden ser utilizados en la observación y el enjuiciamiento de la conducta ofensiva. Los pasajeros también se pedirá que informe cualquier episodios de comportamiento abusivo o idioma no observada directamente por el conductor.

### JEFFTRAN Misión

JEFFTRAN la misión es mejorar la comunidad global de la calidad de vida mediante el suministro adecuado, confiable, accesible y asequible de transporte. JEFFTRAN es operado por la Ciudad de la División de Tránsito de Jefferson, una división de la Sección de Planificación y Transporte del Departamento de Desarrollo de la Comunidad. JEFFTRAN proporciona casi medio millón de viajes disociados de pasajeros al año, mientras que viajar más de 614.000 millas. JEFFTRAN se financia con cargo federal, estatal y fondos de la ciudad, así como las tarifas de pasajeros. JEFFTRAN no discrimina sobre la base de afiliación política, raza, color, religión, origen nacional, sexo, edad, nivel de ingresos o la discapacidad. Si usted siente que ha sido objeto de discriminación, póngase en contacto con JEFFTRAN para el Procedimiento de Quejas del Título VI del Título IV y un Formulario de reclamación, también disponible en el sitio web.

### Gracias por su patrocinio!

**JEFFTRAN**  
Instrumento de transferencia de Ventana-  
Servicio de Atención al Cliente  
820 E. Miller Street  
Jefferson City, Missouri 65101  
573-634-6477, 1-800-735-2966- TDD users  
[www.jeffcitymo.org/transit](http://www.jeffcitymo.org/transit)  
Horario: 6:45 AM – 5:30 PM

**Ayuntamiento**  
Ventana de Finanzas (nivel superior)  
320 E. McCarty Street  
Jefferson City, Missouri 65101  
573-634-6320  
Horario: 8:00 AM – 5:00 PM

*Appendix F*

**JEFFTRAN LEP Survey Responses**

*Notes: For responses with ranges, the average was used in calculation. NA is used to denote where the survey question and response options changed between surveys years.*

1. On average, how often do you assist customers with Limited English Proficiency?  
 \_\_\_\_ times per:   ☐ Day                      ☐ Week ☐ Month                      ☐ Year

	<b>2011</b>		<b>2013</b>		<b>2015</b>	
<b>Response</b>	<b>Number</b>	<b>Yearly Customer Assists*</b>	<b>Number</b>	<b>Yearly Customer Assists*</b>	<b>Number</b>	<b>Yearly Customer Assists*</b>
None or N/A	3	0	4	0	4	0
At least 1 per day	1	260	2	520	2	498
2 per day	3	1560	0	0	0	0
3 per day	0	0	1	780	2	1494
4 per day	0	0	0	0	0	0
5 per day	0	0	1	1300	1	1245
10 per day	1	2600	0	0	0	0
1 per week	0	0	4	208	0	0
2 per week	1	104	1	104	0	0
3 per week	1	156	0	0	0	0
5 per week	0	0	1	260	0	0
10 per week	0	0	0	0	0	0
1 or 2 per month	8	144	4	72	1	12
2 per month					2	24
3 per month					2	24
4 per month					0	0
5 per month					2	24
1 -3 per year	2	4	3	6		0
1 per year					3	3
2 per year					2	2
3 per year					2	2
4 per year					0	0
5 per year					1	1
Total Yearly Assists		4,828		3250		3329



2. On average, how many Limited English Proficient customers use JEFFTRAN to commute daily: ☐  
 One    Two    ☐ Three    ☐ Four    Five    6 – 10

	No. of Responses	Daily Commutes	No. of Responses	Daily Commutes	No. of Responses	Daily Commutes
None or N/A	8	0	6	0	0	0
1	4	4	4	4	6	6
2	na	na	2	4	4	8
3	3	9	2	6	2	6
4	2	8	1	4	4	16
5	na	na	1	5	0	0
6 to 10	2	16	2	16	2	16
		38		34		52

3. On average, how much time do you spend working with customers who are Limited English Proficient?  
 \_\_\_\_ hours per: ☐ Day    ☐ Week    ☐ Month    ☐ Year

	2011		2013		2015	
Response	No. of Responses	Annualized No. of Hours	No. of Responses	Annualized No. of Hours	No. of Responses	Annualized No. of Hours
None or N/A	8	0	4		11	0
15 minutes per day	0	0	0	0	5	311
30 minutes per day	na	na	2	260	1	125
45 minutes per day	0	0	0	0	1	187
1 hour per day	1	260	1	260	0	0
2 hours per day	na	na	0	0	0	0
1 hour per week	1	52	3	152	0	0
2 hours per week	1	104	0	0	0	0
1 hour per month	2	24	0	0	0	0
2 hours per month	1	24	2	48	0	0
Less than 1 hour per month	6	na	5	na	0	0
<b>Total</b>		<b>464</b>		<b>720</b>		<b>623</b>

4. Which language groups do you encounter most frequently when working?



Choose all that apply: ☐ Spanish ☐ German ☐ Russian ☐ Asian ☐ Unknown ☐

Response	2011 Responses		2013 Responses		2015 Responses	
	No.	Percent	No.	Percent	No.	Percent
None or N/A	4	17%	3	11%	4	14%
Spanish	10	42%	14	52%	10	34%
Asian	3	12.50%	5	18%	2	7%
Indian	0	0	0	0	4	14%
English	0	0	0	0	3	10%
Russian	2	8%	1	4%	0	0%
German	0	0	1	4%	0	0%
Unknown	4	17%	3	11%	4	14%
Other	1	4%	0	0	2	7%
Total	24		27		29	

Other

5. Have you ever requested translation or interpretation assistance? ☐ Yes ☐ No

If YES, please check any that apply

☐ In-person ☐ Co-worker ☐ Quick Guide  
☐ Telephone ☐ Dispatcher ☐ Other

Response	2011		2013		2015	
	No. of Responses	Percent	No. of Responses	Percent	No. of Responses	Percent
Yes	3	15%	2	11%	0	0%
No	17	85%	17	89%	19	100%

6. Have you ever received comments or feedback concerning the Spanish Route and Schedule Guides?

Yes ☐ No

Response	2011		2013		2015	
	No. of Responses	Percent	No. of Responses	Percent	No. of Responses	Percent
Yes	1	5%	0	0%	0	0%
No	19	95%	19	100%	19	100%

*Appendix H*  
**Executive Order 13166**

THE WHITE HOUSE  
Office of the Press Secretary (Aboard Air Force One)

For Immediate Release  
EXECUTIVE ORDER 13166  
IMPROVING ACCESS TO SERVICES FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY

August 11, 2000

By the authority vested in me as President by the Constitution and the laws of the United States of America, and to improve access to federally conducted and federally assisted programs and activities for persons who, as a result of national origin, are limited in their English proficiency (LEP), it is hereby ordered as follows:

**Section 1. Goals.**

The Federal Government provides and funds an array of services that can be made accessible to otherwise eligible persons who are not proficient in the English language. The Federal Government is committed to improving the accessibility of these services to eligible LEP persons, a goal that reinforces its equally important commitment to promoting programs and activities designed to help individuals learn English. To this end, each Federal agency shall examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services consistent with, and without unduly burdening, the fundamental mission of the agency. Each Federal agency shall also work to ensure that recipients of Federal financial assistance (recipients) provide meaningful access to their LEP applicants and beneficiaries. To assist the agencies with this endeavor, the Department of Justice has today issued a general guidance document (LEP Guidance), which sets forth the compliance standards that recipients must follow to ensure that the programs and activities they normally provide in English are accessible to LEP persons and thus do not discriminate on the basis of national origin in violation of title VI of the Civil Rights Act of 1964, as amended, and its implementing regulations. As described in the LEP Guidance, recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.

**Sec. 2. Federally Conducted Programs and Activities.**

Each Federal agency shall prepare a plan to improve access to its federally conducted programs and activities by eligible LEP persons. Each plan shall be consistent with the standards set forth in the LEP Guidance, and shall include the steps the agency will take to ensure that eligible LEP persons can meaningfully access the agency's programs and activities. Agencies shall develop and begin to implement these plans within 120 days of the date of this order, and shall send copies of their plans to the Department of Justice, which shall serve as the central repository of the agencies' plans.

**Sec. 3. Federally Assisted Programs and Activities.**

Each agency providing Federal financial assistance shall draft title VI guidance specifically tailored to its recipients that is consistent with the LEP Guidance issued by the Department of Justice. This agency-specific guidance shall detail how the general standards established in the LEP Guidance will be applied to the agency's recipients. The agency-specific guidance shall take into account the types of services provided by the recipients, the individuals served by the recipients, and other factors set out in the LEP Guidance. Agencies that already have developed title VI guidance that the Department of Justice determines is consistent with the LEP Guidance shall examine their existing guidance, as well as their programs and activities, to determine if additional guidance is necessary to comply with this order. The Department of Justice shall consult with the agencies in creating their guidance and, within 120 days of the date of this order, each agency shall submit its specific guidance to the Department of Justice for review and approval. Following approval by the Department of Justice, each agency shall publish its guidance document in the Federal Register for public comment.

**Sec. 4. Consultations.**

In carrying out this order, agencies shall ensure that stakeholders, such as LEP persons and their representative organizations, recipients, and other appropriate individuals or entities, have an adequate opportunity to provide input. Agencies will evaluate the particular needs of the LEP persons they and their recipients serve and the burdens of compliance on the agency and its recipients. This input from stakeholders will assist the agencies in developing an approach to ensuring meaningful access by LEP persons that is practical and effective, fiscally responsible, responsive to the particular circumstances of each agency, and can be readily implemented.

**Sec. 5. Judicial Review.**

This order is intended only to improve the internal management of the executive branch and does not create any right or benefit, substantive or procedural, enforceable at law or equity by a party against the United States, its agencies, its officers or employees, or any person.

WILLIAM J. CLINTON

THE WHITE HOUSE,  
August 11, 2000

Source: <http://www.lep.gov/13166/eo13166.html>